

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

This Filing Relates to:

*All Actions*

**JOINT STATEMENT REGARDING  
MEET-AND-CONFER ON SEARCH  
TERMS TO BE APPLIED TO  
META'S COLLECTIONS**

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

Dear Judge Kang:

Pursuant to the Court's Order Regarding Dispute Concerning Search Terms (ECF 936), the State Attorneys General, PI/SD Plaintiffs, and Meta Defendants respectfully submit this joint statement regarding the Parties' meet-and-confer to resolve disputes regarding the search terms to be applied to Meta's collections.

Counsel for Meta and Plaintiffs met in person in Washington, D.C. on Wednesday, June 12 to confer. Ashley Simonsen, Paul Schmidt, Ed Rippey, Matthew Benov, Maria Georges, and John August joined for Meta, with Previn Warren, Alex Walsh, Thomas Huynh, Doug Forrest, and Nelson Drake representing the Attorney General and PI/SD Plaintiffs. Before and during the June 12 meet-and-confer, Meta shared with Plaintiffs' counsel information about the statistical sampling and hit report extrapolations it performed, along with several search term hit reports and additional information about the custodians sampled.

**The Respective Compromises Each Party Proposed as Their Respective Final Compromise Position:** Both Parties made meaningful compromises before and during the meeting. Over the course of negotiations, including concessions made at this week's meet-and-confer, Defendants agreed to add dozens of Plaintiffs' proposed terms, and Plaintiffs agreed to drop dozens of their proposed terms.

**Whether and to What Extent the Instant Dispute Has Been Either Resolved or Narrowed:** Based on the Parties' compromises, the Parties are now in agreement that Meta will run the 281 terms on Tab 1 of Exhibit A, which the Parties are submitting simultaneously with this filing to Chambers.

**Issues Remaining in Dispute:** The Parties have not yet reached agreement regarding the 105 terms identified on Tab 2 of Exhibit A. The Parties have agreed to a further meet-and-confer on Monday, June 17, to discuss the search terms remaining in dispute.

The Parties are continuing to engage in productive discussions and have agreed that, with the Court's leave, they will continue to meet and confer to see if these remaining differences can be further narrowed or resolved. Should the Parties be unable to reach a complete resolution of their differences, the Plaintiffs anticipate seeking leave to file a letter brief addressing any remaining disputes.

Dated: June 14, 2024

Respectfully submitted,

/s/ Lexi J. Hazam

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**ATTESTATION**

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: June 14, 2024

By: /s/ Ashley M. Simonsen